Approved For Release 2003/12/09 : CIA-RDP85-00988R000400140010-3

OGC 79-03352 11 April 1979

OGC Has Reviewed

MEMORANDUM FOR: Inspector General

Legislative Counsel

Director of Public Affairs

Comptroller

Director, Equal Employment Opportunity

Deputy to the DCI for Resource

Management

Deputy to the DCI for Collection

Tasking

Deputy Director for Administration Director, National Foreign Assessment

Center

Deputy Director for Operations
Deputy Director for Science &

Technology

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Office of General Counsel

SUBJECT

Conflicts of Interests: Post-Employment

Restrictions

- 1. As you are aware, the Ethics in Government Act of 1978 places certain restrictions on the activities of former government officers and employees. Those restrictions have been roundly criticized as being too severe and are now under review by congressional members who have introduced legislation to amend the Act and soften its impact. The Administration is supporting those amendments and expects to see their passage before the restrictions become effective on 1 July. However, the full impact cannot be appreciated until it is known for certain whether the contemplated amendments are actually adopted.
- 2. In the interim, the Office of Government Ethics, which is responsible for overseeing implementation of the new law, published its proposed regulations in this area and has requested comments. This Office is coordinating Agency response, and I have attached a copy of the regulations for your review and any comment. My initial reaction is that the Ethics Office has clarified several ambiguities and that the impact of the new law will not be as restrictive as believed earlier. Moreover, I believe that, for the first time, Government employees will be given a relatively clear idea of the extent to which they may participate in post-employment activities. I have a limited number of additional copies to make available to employees upon request.

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3. I would appreciate any comments or suggestions you
may have regarding the proposed regulation, by 4 May 1979.
since the Ethics Office has proved very amenable to accommodating
our interests over recent weeks. In particular you may wish
to consider how this Agency will attempt to designate
certain "senior employees"those with grades of GS-17 and
above who have significant decision-making or supervisory
authorityas being subject to the more restrictive provisions
of the bill (i.e., the two-year ban on advising others on
matters before, and the one-year total ban on contact with,
the Agency). In this regard see the regulation at section
737.25.

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4. If you have any not hesitate to contact m very much for your cooper	
Attachment	
cc: Director of Logistic Director of Personne Coordinator for Acade Executive Secretary of Assistant to the DDC Chief, Administrative	1 emic Relations/NFAC of STIC

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